

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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|--|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| JOANN INC., <i>et al.</i> , ¹ |) | Case No. 25-10068 (CTG) |
| |) | |
| |) | (Jointly Administered) |
| |) | Docket Nos. 303, 338 |
| Debtors. |) | |
| |) | |

**Objection Deadline: At the Hearing
Hearing Date: February 14, 2025 at 9:30 a.m. (ET)**

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO FILE UNDER SEAL EXHIBIT D OF
ITS OMNIBUS OBJECTION TO DEBTORS' MOTIONS (I) FOR ENTRY OF AN
ORDER APPROVING BIDDING PROCEDURES AND STALKING HORSE
AGREEMENT; AND (II) FOR ENTRY OF A
FINAL ORDER AUTHORIZING THE USE OF CASH COLLATERAL**

PLEASE TAKE NOTICE that, on February 11, 2024 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the of the above-captioned Debtors filed the *Motion for an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Exhibit D of its Omnibus Objection to Debtors’ Motions (I) for Entry of an Order Approving Bidding Procedures And Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

¹ The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be (a) filed with the Bankruptcy Court on or before **February 14, 2025 at 9:30 a.m. prevailing Eastern Time** or (b) may be made in Court at the time of the Hearing, **February 14, 2025 at 9:30 a.m.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon the undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON FEBRUARY 14, 2025 AT 9:30 A.M. PREVAILING EASTERN TIME BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

Dated: February 12, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ James E. O'Neill

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*Proposed Co-Counsel to the Official Committee
of Unsecured Creditors*